

Steve Jakubowski  
Elizabeth Richert  
**THE COLEMAN LAW FIRM**  
77 West Wacker Dr., Suite 4800  
Chicago, Illinois 60601  
Telephone: (312) 606-8641  
Facsimile: (312) 444-1028  
[sjakubowski@colemanlawfirm.com](mailto:sjakubowski@colemanlawfirm.com)

Attorneys for Callan Campbell, Kevin Junso,  
*et al.*, Joseph Berlingieri, Edwin Agosto,  
and Kevin Chadwick, *et al.*

Adina H. Rosenbaum  
Allison M. Zieve  
**PUBLIC CITIZEN LITIGATION GROUP**  
1600 20<sup>th</sup> Street NW  
Washington, DC 20009  
Telephone: (202) 588-1000  
[arosenbaum@citizen.org](mailto:arosenbaum@citizen.org)

Attorneys for Center for Auto Safety, Consumer Action,  
Consumers for Auto Reliability and Safety, National Association of  
Consumer Advocates, and Public Citizen

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----x  
In re : Chapter 11 Case No.  
GENERAL MOTORS CORP., *et al.*, : 09-50026 (REG)  
Debtors. : (Jointly Administered)  
-----x

**NOTICE OF LIMITED OBJECTION OF CALLAN CAMPBELL,  
KEVIN JUNSO, *ET AL.*, JOSEPH BERLINGIERI, EDWIN AGOSTO,  
KEVIN CHADWICK, *ET AL.*, AND THE CENTER FOR AUTO SAFETY, *ET AL.*,  
TO THE DEBTORS' 363 MOTION FOR THE SALE OF THE "PURCHASED ASSETS"  
FREE AND CLEAR OF POTENTIAL SUCCESSOR LIABILITY CLAIMS**

To: See Attached Certificate of Service

PLEASE TAKE NOTICE that on June 19, 2009, we filed with the Clerk of the Court for the United States Bankruptcy Court for the Southern District of New York the *Limited Objection of Callan Campbell, Kevin Junso, et al., Joseph Berlingieri, Edwin Agosto, Kevin Chadwick, et al., and the Center for Auto Safety, et al., to the Debtors' 363 Motion for the Sale of the Purchased Assets Free and Clear of Potential Successor Liability Claims*, a copy of which is attached hereto and hereby served upon you.

June 19, 2009

By: /s/ Steve Jakubowski  
One of Its Attorneys

Steve Jakubowski (IL ARDC# 6191960)  
Elizabeth Richert (IL ARDC# 6275764)  
THE COLEMAN LAW FIRM  
77 West Wacker Drive, Suite 4800  
Chicago, IL 60601  
Tel: (312) 606-8641  
Fax: (312) 444-1028  
[sjakubowski@colemanlawfirm.com](mailto:sjakubowski@colemanlawfirm.com)

Attorneys for Callan Campbell, Kevin Junso,  
*et al.*, and Joseph Berlingieri, Edwin Agosto, and  
Kevin Chadwick, *et al.*,  
Product liability/personal injury claimants

By: /s/ Adina H. Rosenbaum  
One of Their Attorneys

Allison M. Zieve  
Adina H. Rosenbaum  
PUBLIC CITIZEN LITIGATION GROUP  
1600 20<sup>th</sup> Street NW  
Washington, DC 20009  
Telephone: (202) 588-1000  
[arosenbaum@citizen.org](mailto:arosenbaum@citizen.org)

Attorneys for Center for Auto Safety, Consumer  
Action, Consumers for Auto Reliability and Safety,  
National Association of Consumer Advocates, and  
Public Citizen

**CERTIFICATE OF SERVICE**

I, Jamie L. Johnson, a non-attorney hereby certify that I served a copy of the *Limited Objection of Callan Campbell, Kevin Junso, et al., Joseph Berlingieri, Edwin Agosto, Kevin Chadwick, et al., and the Center for Auto Safety, et al., to the Debtors' 363 Motion for the Sale of the Purchased Assets Free and Clear of Potential Successor Liability Claims* on the parties listed below via email unless otherwise specified. Additionally, upon electronically filing with the Clerk of the Court all parties were served via the Court's electronic notification system before 5:00 p.m. (Eastern Time) on June 19, 2009.

Jamie L. Johnson

Harvey R. Miller, Esq. Stephen Karotkin, Esq. Joseph H. Smolinsky, Esq. Weil Gotshal & Manges LLP 767 Fifth Ave. New York, New York 10153 <a href="mailto:harvey.miller@weil.com">harvey.miller@weil.com</a> <a href="mailto:stephen.karotkin@weil.com">stephen.karotkin@weil.com</a> <a href="mailto:Joseph.Smolinsky@weil.com">Joseph.Smolinsky@weil.com</a>	John J. Rapisardi, Esq. Cadwalader, Wickersham & Taft LLP One World Financial Center New York, New York 10281 <a href="mailto:john.rapisardi@cwt.com">john.rapisardi@cwt.com</a>
Gordon Z. Novod, Esq. Thomas Moers Mayer, Esq. Kramer Levin Naftalis & Frankel, LLP 1177 Avenue of the Americas New York, NY 10036 <a href="mailto:gnovod@kramerlevin.com">gnovod@kramerlevin.com</a> <a href="mailto:tmayer@kramerlevin.com">tmayer@kramerlevin.com</a>	James L. Bromley, Esq. Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 <a href="mailto:jbromley@cgs.com">jbromley@cgs.com</a>
Babette Ceccotti, Esq. Cohen Weiss & Simon LLP 330 W. 42 <sup>nd</sup> Street New York, New York 10036 <a href="mailto:bceccotti@cwsny.com">bceccotti@cwsny.com</a>	Michael J. Edelman, Esq. Michael L. Schein, Esq. Vedder Price, P.C. 1633 Broadway, 47 <sup>th</sup> Floor New York, New York 10019 <a href="mailto:mjedelman@vedderprice.com">mjedelman@vedderprice.com</a> <a href="mailto:mschein@vedderprice.com">mschein@vedderprice.com</a>
<u>VIA FACSIMILE</u> Diana G. Adams, Esq. Office of the U.S. Trustee For the Southern District of NY 33 Whitehall St. , 21 <sup>st</sup> Floor New York, New York 1004 Facsimile: (212) 668-2255	<u>VIA FACSIMILE</u> David S. Jones, Esq. Matthew L. Schwartz, Esq. U.S. Attorney's Office, S.D.N.Y. 86 Chambers Street, Third Floor New York, New York 10007 Facsimile: (212)637-2684